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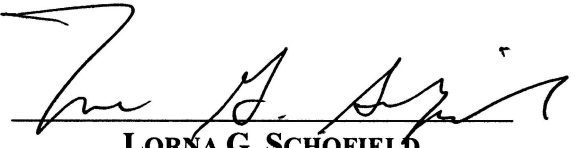
Application GRANTED. The initial conference scheduled for December 14, 2022, is adjourned to **January 11, 2023, at 4:20 P.M.** The deadline to file the materials required in advance of that conference is extended to **January 4, 2023, at 12:00 P.M.** No further extensions will be granted absent extraordinary and compelling circumstances.

December 6, 2022

Dated: December 7, 2022
New York, New York

VIA ECF

The Honorable Lorna G. Schofield
United States District Court Southern District of New York
40 Foley Square
New York, NY 10007



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Leitch et al. v. Amazon Services.Com LLC, Case No.: 22-cv-06121-LGS

Dear Judge Schofield:

We represent Defendant Amazon Services.Com LLC ("Defendant") in the above-referenced action. We write with Plaintiffs' consent pursuant to Your Honor's Individual Rules to request an adjournment of Initial Pretrial Conference scheduled for **December 14, 2022** (and the corresponding December 7th submission deadline for the proposed civil case management plan) until a date after Defendant's current responsive pleading deadline (*i.e.*, after December 19, 2022).¹

Plaintiffs assert a variety of individual, collective, and class claims under the Fair Labor Standards Act, New York Labor Law, Title VII of the Civil Rights Act of 1964, Section 1981 of Title 42 of the United States Code, the Americans with Disabilities Act, the New York State Human Rights Law, and the New York City Human Rights Law. The Amended Complaint involves five named plaintiffs spread between two different Amazon locations (in the Bronx and Staten Island), class action and collective action allegations across multiple Amazon facilities, allegations of wage and hour violations, and highly individualized claims of race discrimination, disability discrimination, and gender discrimination, hostile work environment claims, and retaliation claims.

Based upon Defendant's investigation to date, it presently intends to submit a pre-motion letter regarding a motion to dismiss Plaintiffs' claims by the December 19th responsive pleading deadline. In addition, the parties are currently exploring matters that could potentially result in the narrowing or resolution of claims at issue. We submit that postponing the Initial Pretrial Conference until after December 19th will allow for full exploration of those issues and a more fulsome discussion regarding the scope of necessary discovery and the appropriate schedule for that discovery.

Thank you for your consideration.

Respectfully submitted,

/s/ Sean P. Lynch

Sean P. Lynch

cc: Robert Wisniewski, Esq. - *Counsel for Plaintiffs* (via ECF)

¹ On November 14, 2022, the Court granted the parties' request to extend Defendant's responsive pleading deadline to December 19, 2022 but scheduled the initial pretrial conference for prior to the responsive pleading deadline. (ECF No. 16).

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